

Fox, David R.

From: Maher, Kristine M. <KMaher@Graydon.law>
Sent: Monday, June 28, 2021 16:46
To: dwarrington@dhillonlaw.com
Cc: Fox, David R.
Subject: Philpot v. Turley - discovery objections [IWOV-CN.FID676676]

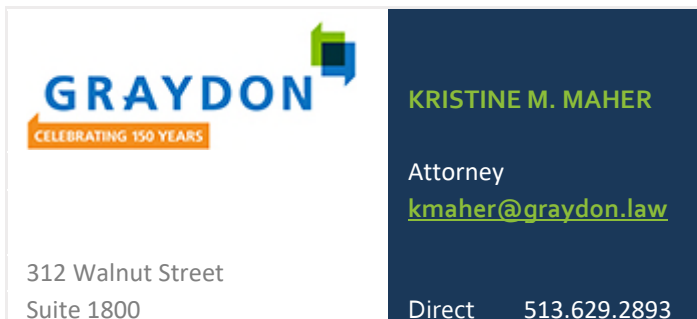
Dave,

A handful of objections to your discovery requests below. Let me know if you'd like to discuss further. We are working on getting our responses and documents together.

We are following up with our client on available deposition dates and look forward to hearing from you on available dates for you and your client.

Thanks,
Kristine

- Plaintiff objects to the definition of "Relevant Period" in the Interrogatories. An approximately seven year span of time is overly broad, unduly burdensome and extends beyond the scope of the relevant facts for this copyright infringement action.
- Plaintiff objects to the request for his income information in Request for Production of Documents No. 11. Plaintiff's income is not at issue or the subject of this litigation. The request is overly broad, not likely to lead to relevant information and is intended to intrude on plaintiff's personal affairs.
- Plaintiff objects to the requests for confidential settlement correspondence or related documents in Request for Production of Documents Nos. 9 and 10 and Interrogatory Nos. 12 and 14. These documents are privileged, confidential and not subject to discovery in the absences of a protective order. In addition, related documents may be subject to attorney-client privilege, and Plaintiff objects on that basis. For those documents, Plaintiff will provide a privilege log.
- Plaintiff objects to the request for all documents related to any photograph whose copyright he owns in Request for Production of Documents Nos. 7 and 8 and the requests to identify every transaction/contract/agreement/license related to any photograph he owns in Interrogatory Nos. 5 and 8. The requests are overly broad, unduly burdensome and not likely to lead to relevant information. Plaintiff is a freelance photographer, and the documentation related to all his works is not relevant to the copyright infringement claim concerning the one photograph at issue in this suit.



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